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[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

CHRISTOPHER ARBOUR, Individually and on Behalf of All Others	<
Similarly Situated,	¿ CLASS ACTION
Plaintiff,	}
VS.	
TINGO GROUP, INC., et al.,	
Defendants.	
MARK J. BLOEDORN, Individually and on Behalf of All Others Similarly	-) No. 2:23-cv-03153-ES-MAH
Situated,	CLASS ACTION
Plaintiff,	
VS.	
TINGO GROUP, INC., et al.,	\(\)
Defendants.	
Situated, Plaintiff, vs. TINGO GROUP, INC., et al.,	CLASS ACTION

DANG J. NGUYEN'S RESPONSE TO COMPETING LEAD PLAINTIFF MOTIONS

MOTION DATE: September 5, 2023

Six motions were filed by putative class members seeking appointment as lead plaintiff in the above-captioned related securities class actions. *See* ECF 3-8. Pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), district courts are to adopt a presumption that the applicant with the largest financial interest in the relief sought by the class that also satisfies the requirements of Fed. R. Civ. P. 23 is the "most adequate plaintiff." 15 U.S.C. §78u-4(a)(3)(B)(iii).

Here, while Dang J. Nguyen and his wife suffered more than \$112,000 in losses as a result of defendants' alleged wrongdoing and satisfies the Rule 23 requirements at this stage, Mr. Nguyen recognizes that they did not suffer the greatest loss. If the Court determines that the movants with greater losses do not satisfy the PSLRA's requirements for appointment as lead plaintiff, Mr. Nguyen remains ready, willing, and able to fulfill that role on behalf of the class.

DATED: August 22, 2023 Respectfully submitted,

COHN LIFLAND PEARLMAN HERRMANN & KNOPF LLP PETER S. PEARLMAN

/s/Peter S. Pearlman
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